ESTTA Tracking number:

ESTTA699478 09/30/2015

Filing date:

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91222839
Party	Plaintiff Randall Pich
Correspondence Address	JIMMY Y KWUN CHRISTIE PARKER & HALE LLP PO BOX 29001 GLENDALE, CA 91209 UNITED STATES PTO@CPH.COM
Submission	Other Motions/Papers
Filer's Name	Jimmy Y. Kwun
Filer's e-mail	pto@cph.com
Signature	/Jimmy Y. Kwun/
Date	09/30/2015
Attachments	91222839_Opposition.PDF(47377 bytes )

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of trademark application **Serial No. 86/332,976** For the mark LVLF Published in the Trademark *Official Gazette* on June 16, 2015

Randall Pich

Opposer,

V.

OPPOSITION TO APPLICANT'S MOTION FOR AN EXTENSION OF TIME TO ANSWER

Applicant.

Randall Pich (herein after "Opposer"), opposes Applicant's motion for an extension of time filed on September 24, 2015, to answer the Notice of Opposition filed on July 16, 2015.

As grounds for opposition, Opposer submits the following:

- 1. On July 16, 2015, Opposer filed a Notice of Opposition to institute the present opposition proceeding.
- 2. The initial deadline for Applicant to file a response to the Notice of Opposition was on August 25, 2015.
- 3. On August 25, 2015, Applicant filed a Motion for an Extension of Time until September 24, 2015, to respond to the July 16, 2015 Notice of Opposition. Out of courtesy, no opposition to the August 25, 2015 Motion for an Extension of Time was submitted.

## Docket No. 110.2\*1/L662

- 4. On September 24, 2015, Applicant filed a further Motion for an Extension of Time until October 24, 2015, to respond to the July 16, 2015 Notice of Opposition.
  - 5. Currently, there are no settlement discussions pending.
- 6. Applicant has had ample time to respond to the Notice of Opposition, and has failed to show good cause to again extend the time for responding.
- 7. Applicant respectfully opposes the second Motion for Extension of Time filed on September 24, 2015, and any subsequent Motions for Extension of Time.

WHEREFORE, Opposer respectfully requests the Board to issue an order denying Applicant's Motion for Extension of Time to respond to the Notice of Opposition.

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

Date: September 30, 2015

Jimmy Y. Kwun

Attorneys for Opposer

P.O. Box 29001

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626/795-9900

## CERTIFICATE OF SERVICE

It is certified that on September 30, 2015, the foregoing **OPPOSITION TO APPLICANT'S MOTION FOR AN EXTENSION OF TIME TO ANSWER** is being served by mailing a copy thereof by first-class mail addressed to:

THE TRADEMARK COMPANY, PLLC

Matthew H. Swyers, Esq. 344 Maple Avenue West, Suite 151 Vienna, VA 22180

By

Anna J. O'Connor

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